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**Employment and Labor Lawyer**

**Via ECF**

Hon. Philip M. Halpern, USDJ  
United States District Court, SDNY  
300 Quarropas St.  
White Plains, NY 10601-4150

Application granted. The parties shall, by February 3, 2025, file their joint *Cheeks* submission and fully executed settlement agreement.

The Clerk of Court is respectfully directed to terminate the letter motion pending at Doc. 21.

Jar SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
January 21, 2025

**Re: Pierre v. Ramapo Manor Nursing Center, Inc.**

**Case No: 24-CV-05778 (PMH)(VR)**

**Motion for Extension of Time**

Dear Judge Halpern:

My firm represents Plaintiff in the above-referenced action, and I respectfully write to request a brief two-week extension of the January 20, 2025 deadline for the plaintiff to file her motion for settlement approval. This request is being made because some additional time is needed for the parties to finalize the settlement papers. No prior request for an extension of this deadline was made.

I thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan

By: Abdul K. Hassan, Esq.

**cc: Defense counsel via ECF**